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1120 20th Street N.W.  
Washington, DC 20036  
202 457-3810

February 28, 1996

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. -- Room 222  
Washington, DC 20554

Re: Ex Parte Meeting  
Docket No. CC 95-116, Telephone Number Portability

Dear Mr. Caton:

On Thursday, February 28, 1996, Mr. B. Cox and I met with Matt Harthun of the Common Carrier Bureau Policy and Program Planning Division to discuss AT&T's previously stated positions in the above referenced proceeding. In addition, the attached number portability order from the state of New York were provided to Mr. Harthun.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Sincerely,

A handwritten signature in cursive script, appearing to read "F. S. Simone".

Frank S. Simone  
Regulatory Division Manager  
Federal Government Affairs

cc: M. Harthun

Attachment

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Frank S. Simone  
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FILED-SESSION OF JAN 17 1996

Approved as Recommended  
and so Ordered  
By the Commission

GOVERNMENT AFFAIRS  
EASTERN REGION - NEW YORK  
TELEPHONE 4723  
DATE RECEIVED ..... 1-25-96 .....

JOHN C. CRARY  
Secretary

STATE OF NEW YORK  
DEPARTMENT OF PUBLIC SERVICE

ISSUED &  
EFFECTIVE JAN 23 1996

January 4, 1996

TO: THE COMMISSION

FROM: COMMUNICATIONS DIVISION

SUBJECT: CASE 94-C-0095 - Proceeding on Motion of the Commission to Examine Issues Related to the Continuing Provision of Universal Service and to Develop a Framework for the Transition to Competition in the Local Exchange Market.

Number Portability Trial - Progress Report

Petition of Rochester Telephone Corp. to  
discontinue the Rochester number portability trial

RECOMMENDATION: It is recommended that the Commission:

- 1) endorse the trial Steering Committee's selection of Location Routing Number as a permanent number portability solution in New York;
- 2) direct Staff, in consultation with the trial Steering Committee, and other interested parties, to begin to develop a framework for deployment of long-term number portability in New York; and,
- 3) grant the petition of Rochester Telephone Corp. to relieve it of its obligation to conduct a number portability trial in its service territory.

SUMMARY

The Commission, by its September 25, 1995 order, authorized trials of service provider number portability in Manhattan and Rochester.<sup>1</sup> The Commission also directed Staff to submit a progress report by January 1, 1996 and to include in

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<sup>1</sup> Case 95-C-0095 - Order Authorizing Trials of Service Provider Number Portability in Manhattan and Rochester, issued September 25, 1995.

telecommunications companies to determine the feasibility of a trial, and to develop a framework to implement a trial of long-term number portability solutions. Staff reported that it believed that trials, in both Manhattan and Rochester, were not only feasible, but should proceed, in three phases. Phase I would use an unassigned central office code with lines divided by line number among the trial participants and test calls would be placed to demonstrate functionality. Phase II would utilize certain central office codes currently in use. Line numbers for administrative offices of the trial participants which reside in the trial central offices would be ported between carriers and the processing of normal traffic would be evaluated. Phase III would test the vendor platform with customers who, at the time of trial, are assigned line numbers out of the trial central offices.

In preparing for the trials in their respective service territories, two of the trial partners, New York Telephone (NYT) and Rochester Telephone Corp. (RTC), expressed concern to Staff that several technical shortcomings could affect the conduct of the trials, including possible adverse effects on non-trial customers during Phases II and III. These concerns were discussed in Staff's August report to the Commission; however, we concluded that NYT's and RTC's comments did not provide sufficient reason to abandon the trials altogether or to delay them. The Commission did, however, direct Staff, to consult with the trial partners, and to report, by January 1, 1996, on the progress that had been made in resolving these technical issues. In addition, the Commission directed that the report also include the steps that would need to be taken to ensure that service to non-trial customers would not be adversely affected during the trial, and a discussion of possible long-term number portability approaches and the relevant context of the proposed trials within that framework.

#### DISCUSSION

Based on its ongoing collaborative efforts with the trial partners, Staff submits this memorandum and the attached

recommends that the Commission endorse their selection.<sup>1</sup> As an additional means of inviting public comment on this issue, we also published a notice of proposed regulatory action in the November 1, 1995 State Register and, among other things, invited comments from the public on "viable long-term approaches to number portability." Other than the consensus report attached to this memorandum, no other comments have been received by us.

Location Routing Number or LRN is emerging as the most viable long term number portability solution as it is generally recognized that it minimizes impacts on carriers' existing network architecture by preserving existing routing logic and hierarchy, minimizing switch modifications, SS7 impacts, and changes to databases and various operating systems. Equally important, LRN preserves various feature functionalities (e.g., Call Return, Automatic Recall, etc.) for CLASS customers. In our August 23, 1995 memo, we detailed some of the technical problems associated with both the Manhattan and Rochester<sup>2</sup> trial approaches. Workarounds for the trials were expected to all but eliminate these problems, but the long-term view is that major switch development work would have been necessary to eliminate these problems altogether. LRN is expected to resolve all these issues satisfactorily.

There are several other factors which have caused LRN to emerge as the industry consensus for long-term number portability. For example, LRN can be migrated to other forms of number portability such as location and service portability.<sup>2</sup> It is acknowledged that the Manhattan trial approach is limited to service provider number portability. Second, LRN uses a single customer-specific telephone number for porting customers from one switch to another, thereby conserving number resources.

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<sup>1</sup> Other states, including Illinois, California and Maryland, have adopted LRN as the call model for permanent service provider number portability deployment. Many of the Steering Committee members are also working in these other venues.

<sup>2</sup> Currently, our focus is primarily on service provider number portability.

aspects of how the solutions will work, to the operational and administrative aspects of intercompany processes involved in changing a customer from one company network to another.<sup>1</sup> In addition, there are other operational issues, such as public safety issues and operator systems impacts, about which the trial can provide valuable additional information. It should be noted, however, that the degree of support for proceeding beyond Phase I of the trial varies by individual company. A decision to move to Phase II and III will be made after careful review of the results of Phase I.

In addition to continuing with the Manhattan trial, the Steering Committee recommends that a parallel effort be undertaken to work through other issues which will accelerate deployment of long-term number portability, such as a process to choose a neutral database administrator and the development of a service management system (SMS) database, exploration of cost recovery, billing and rating and legal issues, and other matters deemed crucial to successful implementation of long-term number portability. Beginning to work through these issues now, with the knowledgeable and committed members of the existing Steering Committee, and any other interested parties, can only serve to accelerate actual deployment of service provider number portability. The six month Manhattan trial is unlikely to end significantly before August 1, 1996. Deployment of LRN is currently scheduled to begin in the first quarter of 1997; therefore, there is little to be gained in waiting for the trial's end to begin to address issues that must be addressed

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<sup>1</sup> While it would appear to be desirable to trial LRN in some form, according to AT&T, LRN is not sufficiently far enough along in its current development to have any version of it available for the February 1, 1996 start date of the Manhattan trial. Moreover, AT&T has indicated that it does not intend to trial LRN outside its own laboratories in any case. Some routine inter- and intra-company testing will be required, however.

New York State, including the identification and resolution of all of the operational issues associated with long-term deployment.

It is further recommended that, since no pertinent additional information will be gained by going forward with the Rochester trial, Rochester Telephone Corp.'s petition to discontinue the Rochester trial be granted, and the trial of number portability in Rochester be cancelled.

Respectfully submitted,



Paula M. Adams  
Principal Communications Rates  
Analyst



Gregory C. Pattenau  
Associate System Planner

Reviewed by,



Yog R. Varma  
Chief System Planner

Approved by,



Richard Stannard  
Director of Communications Division

## **ATTACHMENT A**



NEW YORK STATE NUMBER PORTABILITY TRIAL  
STEERING COMMITTEE  
CONSENSUS REPORT

The New York Number Portability Trial Steering Committee submits this report to the New York Public Service Commission (NYPSC or the Commission) in compliance with the Commission's Order dated September 25, 1995 in Case 94-C-0095.<sup>1</sup> This report<sup>2</sup> addresses the viability of the number portability approaches being trialed in New York within the context of the long-term number portability framework currently being developed by the telecommunications industry as a whole. Due to recent changes which have taken place in the industry with regard to long-term approaches, the Steering Committee believes that, in addition to the trial, it also should initiate parallel discussions and encourage all other necessary work effort to identify and resolve other issues related to an expeditious and full deployment of long-term number portability in the state of New York. It is noted, however, that participation in this effort is not necessarily a firm commitment by any party to begin implementation of long term number portability as soon as practicable, although full cooperation toward that goal is requested and will be appreciated.

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<sup>1</sup> Case 94-C-0095 - Order Requiring Interim Number Portability Directing a Study of the Feasibility of a Trial of True Number Portability and Directing Further Collaboration issued March 8, 1995.

<sup>2</sup> While this consensus report is based on the numerous deliberative sessions of the Steering Committee members, various members have also filed their written positions on the status of the trials, other number portability issues and the emergence of a long-term consensus approach. These comments are attached (Attachment I) to this consensus report for completeness and clarity: Time Warner Communications' comments dated November 22, 1995, MFS Communications Company, Inc.'s comments dated November 28, 1995, Rochester Telephone Corp.'s comments dated November 29, 1995, Cellular One's comments dated November 29, 1995, MCI Telecommunications Corporation's comments dated November 29, 1995, AT&T Communications' comments dated November 29, 1995, U.S. Intelco Network's comments dated November 29, 1995, New York Telephone Company's comments dated December 4, 1995, and TCG's comments dated December 5, 1995.

in the mid 1997 timeframe.<sup>1</sup> Nevertheless, as discussed below, the consensus of the Steering Committee members is that only the Manhattan trial, using the MCI Metro approach, should be permitted to go forward, although the degree of support for going forward beyond Phase I of the three phase trial varies by individual company and, that no additional useful purpose would be served by going forward with the Rochester trial as well.

(ii) GENERAL CHANGES IN TRIAL FOCUS

As stated above, the Steering Committee believes that the Manhattan trial should proceed ahead. However, since we will not be trialing what is now becoming a consensus long-term solution to number portability, as originally intended, the focus of the trial should be modified. The Steering Committee believes that the trial can be highly beneficial in highlighting issues related to public safety (i.e., how 911 and E911 services can be expected to be impacted by number portability), as well as impacts on operator systems, billing systems and other operational issues. For example, the testing of 10 digit Global Title Translations in the SCPs<sup>2</sup> is necessary on ported calls for proper completion of Automatic Recall/Automatic Callback and CLASS services that have edit lists associated with them (such as Selective Call Acceptance/Rejection). This application has not been tested anywhere and has value to eventual LRN deployment.

(iii) SPECIFIC CHANGES TO THE ROCHESTER TRIAL

Only three parties had committed to the Rochester trial -- Rochester Telephone, Time-Warner, and Cellular One. Due to technical constraints, both Time-Warner and Cellular One would have participated only in Phase I of the trial. After careful review and analysis of the business need to proceed with the Rochester trial, the three trial participants are in agreement

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<sup>1</sup> MCI Metro believes that the methodology it put forth in the trial, Carrier Portability Code (CPC), can be deployed as a viable interim solution until the full-scale deployment of LRN.

<sup>2</sup> Service Control Points.

(v) NON-TRIAL CUSTOMER IMPACTS

There are three features/services, Automatic Callback/Automatic Recall, ISDN and coin phones, which do not interact with the existing AIN<sup>1</sup> 0.1 database look-up trigger which will be used by NYT in the trial. The industry's major switch vendors have already begun to review the trigger interaction problems, and resolution of these issues, most likely using a unique six-digit trigger for portability, is expected in the fourth quarter 1996 or the first quarter 1997 timeframe, well beyond the projected February 1, 1996 Manhattan trial start date for the six-month trial. One way of avoiding these interaction problems is the use of a 10-digit trigger "work-around" on each number that is ported (rather than a 6 digit trigger on the entire portable NXX). However, it is acknowledged by all trial participants that 10-digit triggers are not practicable in the long-term due to administrative complexities, but it will allow numbers to be ported in a trial environment, without "breaking" features such as Automatic Callback/Automatic Recall, for other customers in the trial NXX. The use of a 10-digit trigger will also not impact coin lines or customers subscribing to ISDN.

There is disagreement among the parties over the use of a 6-digit trigger. Several parties believe that the 6-digit trigger will more properly emulate deployment conditions, and only the incumbent carrier has the call volumes necessary to provide reasonable test conditions. However, NYT has declined to use a 6-digit trigger, which requires use of trial-specific, custom software to avoid breakage of other services, and, in NYT's opinion, is not suitable for use outside of a laboratory environment.<sup>2</sup> Because the potential adverse impact of using such a trigger on non-trial customers is unknown, NYT has declined to use such custom software.

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<sup>1</sup> Advanced Intelligent Network.

<sup>2</sup> AT&T Communications does not agree that the said software is not suitable outside the laboratory environment.

operational issues, deployment costs, cost recovery, and other technical issues which need to be addressed prior to the deployment of long-term number portability in New York. Finally, the Steering Committee also recommends that the Commission direct the industry to develop an implementation strategy for a long term service provider number portability solution (i.e., LRN) so that such an approach can be deployed in New York on an expeditious basis.

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Larry Chu  
New York Telephone

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Dave Keech  
Rochester Telephone Corp.

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Pamela Kenworthy  
MFS Communications

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Richard Fipphen  
MCI

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Penn Pfautz  
AT&T Communications

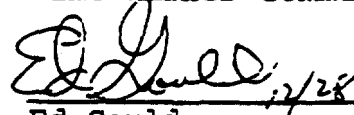
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Dan Engleman  
Time-Warner Communications

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Sharon Rowley  
Cellular One/  
Genessee Telephone Company

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Ed Gould  
Teleport Communications Group

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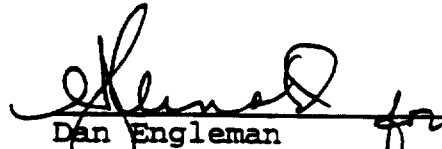
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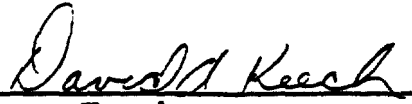
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*Sharon W. Rowley*  
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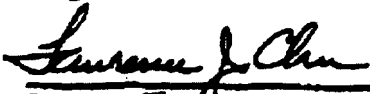
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Genesee Telephone Company

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Ed Gould  
Teleport Communications Group



November 22, 1995

Mr. Yog Varma  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

Dear Yog:

Following are the Steering Committee's areas of consensus reached at our last meeting 11/17/95 in New York, according to my notes:

- New York should pursue LRN/NRA as a long-term Local Number Portability (LNP) solution.
- We should take a dual path approach, continuing with our trial activities at the same time that we plan for the long-term LNP deployment.
- All the trial participants wish to support the New York Commission's agenda to determine costs and feasibility for a long-term LNP solution.
- Cellular One will only participate in Phase 1 of the Rochester trial. Time Warner can only participate in Phase 1 because we have not found a cost-effective work around for CLASS Automatic Callback and Automatic Recall (AC/AR) breakage due to AIN 0.1 PODP triggers. The only other trial participant is Rochester Telephone. We should scale the trial back to Phase 1 only.
- We should do a careful evaluation of Phase 1 results in the Manhattan trial before proceeding to Phase 2. Depending on the timing of a mass market CLASS offering, Time Warner may not be able to participate in Phase 2 because of the AC/AR breakage mentioned above.
- All the trial participants see value in testing 10-digit Global Title Translations in the SCP data base.



Communications Company, Inc.

6 CENTURY DRIVE, SUITE 300  
PARSIPPANY, NEW JERSEY 07054  
TEL (201) 938-7300  
FAX (201) 938-7710

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DEC 1 1995

SYSTEM PLANNING SECTION  
COMMUNICATIONS DIVISION

November 28, 1995

Mr. Yog Varma  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

Dear Yog:

The attached position paper represents MFS' comments regarding the start of the number portability trial in New York and specific issues to be incorporated in the January 1996 report to the Commission. I look forward to working towards implementation of number portability in New York.

If you have any questions, please do not hesitate contact me. My telephone number is 201 938-7387. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Kenworthy".

Pamela Kenworthy  
Manager - Number Administration

RECEIVED

DEC 5 1995

SYSTEM PLANNING SECTION  
COMMUNICATIONS DIVISION



Mr. Yog Varma  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

November 28, 1995

Dear Mr. Varma:

As discussed at our Steering Committee meeting in New York, on November 17th, Rochester supported a consensus agreement on the parameters of the Rochester based trial of the USIN/Stratus CNA/NNA approach. Following are the main points upon which we believe consensus was reached.

- 1) The participants are to be Rochester Telephone, Time Warner Communications, and Cellular One. Other parties have declined to participate.
- 2) The trial site is to be moved from the Stone Street office to the Ridge Road office.
- 3) Due to the unavailability of acceptable and/or cost effective resolutions to most of the technical problems that have been noted, in the trial timeframe, we agreed to scale back the trial to include only Phase One, thus excluding active NXXs and live traffic.
- 4) Those agent types which incur adverse interactions with the AIN triggers will be excluded from the trial.
- 5) We will explicitly test the ten digit global title translation application of the SCP.
- 6) Due to slippage in the timeline for USIN/Stratus to develop this application the new target start date is on or about March 1, 1996.

Further, we agreed that a parallel work effort is needed to identify and detail other issues and critical paths that would have to be addressed in any subsequently developed plan which addresses implementation. Discussed was the need to identify the processes and procedures that would have to be in place to support database dependent number portability. These practices would, in turn, drive the requirements for an SMS, OSS administration, and billing systems.

This effort will allow each company to then independently determine the impacts on its existing or planned systems, and develop cost and timeframe data. This data, along with trial results, can then be used by these companies as an input to the development of their implementation plans and timelines.

**CELLULARONE**  
Genesee Telephone Company

Yog Varma  
New York State  
Department of Public Service  
Three Empire State Plaza  
Albany, New York 12223

3144 Winton Road South  
Rochester, NY 14623-2932  
tel 716-292-6300  
fax 716-729-1515

November 29, 1995

Dear Mr. Varma:

Cellular One's intent in participating in the number portability trial, to be held in Rochester, was to gather cost and operational data in order to test the economic and technical viability of a potential long term number portability solution. Even though the New York trial will not be testing the "currently perceived" long term national solution - LRN, we still believe that there is value to be derived from conducting a number portability trial in New York State.

Value will not only be gained from the participation in and exposure to the operation of a network in a number portability environment, but also from the resulting impacts on the operational support and billing systems.

We feel that the decision regarding six versus ten digit translations should be driven by the option that is the most beneficial to both the consumer and the network provider. With a ten digit trigger every call will require a database dip which incurs post dialing call delays and additional unproductive burden on the signaling networks. With a six digit trigger only those NXX's with ported numbers will require a database dip. This effectively eliminates unnecessary post dialing delays and reduces call set up times; therefore, a six digit translation offers a sound basis on which to start - offering the least impact on the consumer and on the SS7 network. We do recognize that as the quantity of ported numbers increases the savings of a six digit over a ten digit translation will become a moot point, and that some subscriber features will require ten digit triggers.

In conclusion, we feel that a number portability trial in New York State should continue according to plan to serve as an evaluation of the overall feasibility, and as an assessment of the end user and service impacts, concluding with an examination of all relative costs.

Respectfully submitted,

*Sharon Rowley*

Sharon Rowley  
Director of Expanded Access

portability, regardless of which call model is adopted as the LNP solution for New York State. In addition, the educational value of the trial will be maximized if the trial participants are able to use six digit triggering mechanisms, rather than the ten digit triggers discussed at the last meeting.

As you know, in recent filings with the Federal Communications Commission as well as in other fora, MCI and AT&T have recommended a single, integrated approach to LNP deployment, under which MCI's "Carrier Portability Code" model is implemented as an interim means of providing "true" local number portability, followed by a transition to AT&T's "Location Routing Number" model when that solution becomes available in the future. The recommendation is based on numerous factors, including:

- Phase I deployment -- CPC -- has the advantage of being in service as early as the second half of 1996 and requires relatively minor switch development, while Phase II deployment -- LRN -- delivers a full range of capabilities when it becomes available at a future date.
- The vast majority of network elements and switch development required for Phase 1 CPC would be reusable and necessary when the permanent Phase 2 LRN solution is implemented. These reusable costs include those



combined with the certainty that high-priced RCF and DID alternatives create a financial disincentive for RBOCs to facilitate rapid true portability deployment, make this two-phase deployment plan the optimal approach toward the development of robust competition in the local exchange.

- On the other hand, leaving new entrants with only the deficient and expensive RCF and DID options for as long as two years or more, will seriously undermine their attempts to establish a competitive marketplace.

Despite vendor statements about LRN availability in the second quarter of 1997, MCI does not believe that LRN-based number portability can or will be implemented in that time frame, given a number of unresolved issues and the incumbent LECs' lack of commitment to deploy LRN when that solution is available.

Accordingly, MCI believes that the steering committee and the Commission should consider limiting the New York trial to Phase I only and that the Commission should order the industry to begin the work that is necessary to achieve state wide implementation of local number portability during 1996. Further, the steering committee should be directed to address a number of issues while Phase I is in process, including SMS development, legal issues, etc. The Commission and industry should not wait